

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE: ) BANKRUPTCY CASE  
)  
MEGAN L. LEONARD, ) NO.: 19-16133  
)  
Debtor. ) CHAPTER 13  
)  
) JUDGE: JACQUELINE P. COX  
)

**NOTICE OF MOTION**

TO: SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE THAT ON September 9, 2019, at 9:00 am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Jacqueline P. Cox, U.S. Bankruptcy Judge, 219 South Dearborn Street, Room 680, Chicago, Illinois 60604, and shall then and there present the attached Motion and at which time you may appear if you so desire.

**CERTIFICATION**

I, the undersigned Attorney, Certify that I served a copy of this Notice to the Addresses attached by electronic notice through ECF or by depositing the same at the U.S. Mail at 1 North Dearborn, Chicago, Illinois 60602 at 5:00 P.M. on August 28, 2019, 2019, with proper postage prepaid.

McCalla Raymer Leibert  
Pierce, LLC

/s/Toni Townsend

Toni Townsend  
ARDC# 6289370

1 N. Dearborn Suite 1200  
Chicago, IL 60602  
(312) 346-9088

**This is an attempt to collect a debt and any information obtained will be used for that purpose.**

**NOTICE OF MOTION ADDRESSES**

To Trustee:  
Tom Vaughn  
55 E. Monroe Street  
Suite 3850  
Chicago, IL 60603

*by Electronic Notice through ECF*

To Debtor:  
Megan L. Leonard  
11154 S Troy St  
Chicago, IL 60655

*Served via U.S. Mail*

To Attorney:  
David M Siegel  
David M. Siegel & Associates  
790 Chaddick Drive  
Wheeling, IL 60090

*by Electronic Notice through ECF*

McCalla Raymer Leibert Pierce, LLC  
Attorney For: Creditor  
1 N. Dearborn Suite 1200  
Chicago, IL 60602  
(312) 346-9088

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**MOTION TO MODIFY THE AUTOMATIC STAY**

NOW COMES Nationstar Mortgage LLC d/b/a Mr. Cooper by and through its attorneys, McCalla Raymer Leibert Pierce, LLC, and requests that the Automatic Stay heretofore entered on the property located at 11154 S Troy St, Chicago, Illinois 60655 be Modified stating as follows:

1. On June 05, 2019, the above captioned Chapter 13 was filed.
2. The above captioned Chapter 13 has not been confirmed.
3. Nationstar Mortgage LLC d/b/a Mr. Cooper services the first mortgage lien on the property located at 11154 S Troy St, Chicago, Illinois 60655.
4. The Plan calls for the Debtor to be the disbursing agent for the post-petition mortgage payments directly to Nationstar Mortgage LLC d/b/a Mr. Cooper. Post-petition payments are \$794.67.
5. The post-petition mortgage payments are due and owing for July 01, 2019. The default to Nationstar Mortgage LLC d/b/a Mr. Cooper is approximately \$1,589.34 through August 2019. Another payment will come due on September 1, 2019 in the amount of \$794.67.

6. Attorney's fees and costs for this motion are due in the amount of \$1,031.00.
7. The plan is in material default.
8. Nationstar Mortgage LLC d/b/a Mr. Cooper continues to be injured each day it remains bound by the Automatic Stay.
9. Nationstar Mortgage LLC d/b/a Mr. Cooper is not adequately protected.
10. The property located at 11154 S Troy St, Chicago, Illinois 60655 is not necessary for the Debtor's reorganization.
11. The Debtor has no equity in the property for the benefit of unsecured creditors.
12. Nationstar Mortgage LLC d/b/a Mr. Cooper directly or through an agent, has possession of the promissory note and held the note at the time of filing of the Movant's Motion for Relief from the Stay.
13. No cause exists to delay the enforcement and implementation of relief and Bankruptcy Rule 4001(A)(3) should be waived.

WHEREFORE, YOUR MOVANT respectfully prays that the Automatic Stay on the property located at 11154 S Troy St, Chicago, Illinois 60655, be modified and that Bankruptcy Rule 4001(a)(3) be waived as not applicable, and leave be granted to Nationstar Mortgage LLC d/b/a Mr. Cooper to proceed with nonbankruptcy remedies including foreclosure, and for such other and further relief as this Honorable Court deems just.

McCalla Raymer Leibert Pierce, LLC

By: /s/Toni Townsend

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